

Question 1: How should Ofcom manage the process of taking advice from users, regulators and government on efficient apportionment of AIP fees in the maritime and aeronautical sectors? Are any new institutional arrangements needed?:

MRT, RNLI and other non for profit volunteer life saving organisations should all be included in the process through their umbrella organisations, eg in the case of Scottish Mountain Rescue they would be represented by the MRCofS

Question 2: If you consider that our proposals for pricing ground station users for any spectrum would be likely to have a detrimental impact on safety, please let us know. In order for us to understand your assessment fully, it would be helpful if you could outline the mechanisms whereby this might happen.?:

Scottish MRT's rely on the UK SAR band plan to plan, co-ordinate and expedite exercises and live rescues. This function is often carried out in remote areas where mobile phone coverage and Airwave have little or no coverage. Any serious financial encumbrance to most MRT's would most likely put severe pressure on their ability to function effectively. Like everyone else MR teams must try and build health and safety into their methods of operations. Reducing their radio capacity through financial limitations would only increase the risk to members and casualties alike.

Question 3: Do you have any evidence which indicates that AIP charged to ground stations could have a material detrimental impact on UK competitiveness?:

UK land rescue is carried out at little or no cost to the taxpayer. The UK SAR band plan arose after such disasters as Lockerbie, where the phone network collapsed, and the comms between inter agencies were a complete disaster. MR radios and their mobile bases enabled initially at least to coordinate what was a very difficult and harrowing incident. There have been other incidents when the civil comms network fell apart and the bandplan system proved to be the only effective comms link.

To heap costly and unnecessary licences onto the SAR community can only be counter productive.

Question 4: Taking into account the information available in this document, including that set out in Annex 5, our initial views on VHF radiocommunications licence fees and on the reference rates for bands in other uses, and any information you have about the organisations to whom we are proposing to charge fees, please provide any evidence that you think is relevant to us in considering the financial impact of the fees we intend to propose for VHF radiocommunications, or for other uses:

UK MR is carried out on a volunteer basis, is a free service serviced by mainly fund raising and donations. Crucial decisions on how to spend their limited resources is difficult enough at best. Any extra large outgoings could seriously compromise the

effectiveness of all teams. We are not businesses where we can simply pass on the price rise to the customer.

Question 5: Do you agree that there is little to be gained, in terms of economic efficiency, from charging AIP to WT Act licences for aircraft:

YES

Question 6: Do you consider that we should discount fees for any particular user or type of user? Specifically, do you consider that there should be a discount for charities whose object is the safety of human life in an emergency:

Yes 100% discount for SAR bandplan users, RNLI and other non profitable, volunteer organisations where members give up their time for free and essentially save lives as well as save the tax payers large sums of moneys.

Question 7: Do you agree that Ofcom should apply AIP to ground stations? use of maritime and aeronautical VHF radiocommunications channels, to help manage growing congestion in current use and to ensure that the cost of denying access to this spectrum by potential alternative applications is faced by current users?:

Sounds reasonable if the spectrum is being used for non life saving purposes. Leisure, commercial business etc.

Charging the SAR community on land and water can only be detrimental to the common good.

Question 8: Do you agree with our initial view that it would be appropriate to apply a pricing system similar to that already existing for Business Radio licences to maritime and aeronautical VHF communications? If not, what are your reasons for proposing that we should develop a fee structure for maritime and aeronautical VHF channels which is distinct from that already established for Business Radio?:

NO, The UK SAR community are allocated channells under the UK SAR band plan to enable training and to react to emergency situations. We are not corporate bodys with the ability to pass on costs.

Question 9: Are there any short term reasons specific to the sector(s) why it would be inappropriate to apply fees from April 2009?:

I doubt we could pay fees and still have the capacity to opperate as we do.

Question 10: Ofcom would welcome stakeholders' views on the factors which should be taken into account when apportioning fees between individual users of radars and racons:

I do not believe this affects land SAR.

Question 11: Do you agree with our initial view that a reference rate of £126k per 1 MHz of national spectrum for L band and S band radar spectrum would achieve an appropriate balance between providing incentives to ensure efficient use of spectrum while guarding against the risks of regulatory failure in setting the reference rate too high? If you consider a different rate would be more appropriate, please provide any evidence that you think we should take into account.:

Voluntary organisations using the UK SAR band plan should pay for this.

Question 12: Do you agree with our initial view that a reference rate of £25k per single MHz of national spectrum would be appropriate for deriving fees for licences to use X band radar?:

No comment.

Question 13: Do you agree that, generally, spectrum used by aeronautical radionavigation aids is currently uncongested? Do you believe that this may change during the next few years and, if so, approximately when?:

No comment.

Question 14: Do you agree with the basis on which Ofcom has arrived at its initial view on reference rates for aeronautical radionavigation aids?:

No comment.

Comments:

As an individual with 33yrs experience in Scottish MR I feel concerned that OfCOM are proposing to charge substantial fees to volunteer charitable organisations. This will only be to the detriment of rescuers and casualties alike. What we have is not perfect but it does work quite well. The UK SAR Bandplan is one of the major improvements to individual safety of team members. In brief "It ain't broke so don't fix it" especially at an horrendous cost.